

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND

3 VERDESSA MCDUGALD

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*

4 Plaintiff

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* Civil Action No.:

5 v.

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* 1:17-cv-02898-SAG

6 DETECTIVE MICHAEL

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7 SPINNATO, et al.

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9 Defendants

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12 Pursuant to Notice, the deposition of
13 Tahesha Juanita White was taken on Monday, March
14 16, 2020, commencing at 9:59 a.m., at the law
15 offices of Schlachman, Belsky & Weiner, P.A.,
16 Schlachman, Belsky & Weiner, P.A., 300 East Lombard
17 Street, Suite 1100, Baltimore, Maryland 21202,
18 before Richard D. Baker, Jr., Notary Public.

19

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21 Reported by: Richard D. Baker, Jr.

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2 to 5

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 ON BEHALF OF THE PLAINTIFF</p> <p>3 LATOYA FRANCIS-WILLIAMS, ESQUIRE</p> <p>4 Law Office of A. Dwight Pettit, P.A.</p> <p>5 3606 Liberty Heights Avenue</p> <p>6 Baltimore, Maryland 21201</p> <p>7 Telephone: 410-542-5400</p> <p>8 E-mail: latoya.f.williams@gmail.com</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANTS</p> <p>11 CHAZ R. BALL, ESQUIRE</p> <p>12 Schlachman, Belsky & Weiner, P.A.</p> <p>13 300 East Lombard Street, Site 1100</p> <p>14 Baltimore, Maryland 21202</p> <p>15</p> <p>16 Telephone: 410-685-2022</p> <p>17 E-mail: Cball@sbwlaw.com</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p style="text-align: right;">Page 4</p> <p>1 TAHESHA JUANITA WHITE,</p> <p>2 called for examination, having been duly sworn to</p> <p>3 tell the truth, the whole truth and nothing but the</p> <p>4 truth, testified as follows:</p> <p>5 EXAMINATION BY MR. BALL:</p> <p>6 Q Good morning, Ms. White.</p> <p>7 A Good morning.</p> <p>8 Q Can you please state your full name for</p> <p>9 the record?</p> <p>10 A Tahesha Juanita White.</p> <p>11 Q What's your current address?</p> <p>12 A Do I have to give my current address?</p> <p>13 Q That's fine. My name is Chaz Ball, I'm</p> <p>14 an attorney. This process is what's called a</p> <p>15 deposition. Mr. Baker is trying to get everything</p> <p>16 down as we go through it. So there's a few sort of</p> <p>17 ground rules that I'll walk through, and it's just</p> <p>18 so he is able to get everything down. In normal</p> <p>19 conversation you might know the question I'm asking</p> <p>20 before I finish it, I might know the answer you're</p> <p>21 giving before you finish it, but we have to try not</p>																																										
<p style="text-align: right;">Page 3</p> <table border="0"> <thead> <tr> <th style="text-align: left;">1 INDEX</th> <th style="text-align: left;">PAGE</th> </tr> </thead> <tbody> <tr> <td>2 WITNESS: Tahesha Juanita White</td> <td></td> </tr> <tr> <td>3 EXAMINATION: By Mr. Ball</td> <td>4</td> </tr> <tr> <td>4 By Ms. Francis-Williams</td> <td>43</td> </tr> <tr> <td>5 By Mr. Ball</td> <td>45</td> </tr> <tr><td>6</td><td></td></tr> <tr><td>7</td><td></td></tr> <tr><td>8</td><td></td></tr> <tr><td>9</td><td></td></tr> <tr><td>10</td><td></td></tr> <tr><td>11</td><td></td></tr> <tr><td>12</td><td></td></tr> <tr><td>13</td><td></td></tr> <tr><td>14</td><td></td></tr> <tr><td>15</td><td></td></tr> <tr><td>16</td><td></td></tr> <tr><td>17</td><td></td></tr> <tr><td>18</td><td></td></tr> <tr><td>19</td><td></td></tr> <tr><td>20</td><td></td></tr> <tr><td>21</td><td></td></tr> </tbody> </table>	1 INDEX	PAGE	2 WITNESS: Tahesha Juanita White		3 EXAMINATION: By Mr. Ball	4	4 By Ms. Francis-Williams	43	5 By Mr. Ball	45	6		7		8		9		10		11		12		13		14		15		16		17		18		19		20		21		<p style="text-align: right;">Page 5</p> <p>1 to talk over one another. Do you understand that?</p> <p>2 A Yes.</p> <p>3 Q In normal conversation, you know, we nod</p> <p>4 our head, we shake our head or say uh-huh or</p> <p>5 huh-uh, and that doesn't necessarily pick up well.</p> <p>6 So try, if you remember, to answer verbally when</p> <p>7 you can, okay?</p> <p>8 A Yes.</p> <p>9 Q Okay. If there's anything that you</p> <p>10 don't remember, it's perfectly fine to say you</p> <p>11 don't remember. If there is anything you don't</p> <p>12 know, it's perfectly fine to say you don't know.</p> <p>13 If I ask you a question and you answer the</p> <p>14 question, my assumption is going to be that that's</p> <p>15 something you do know or you do remember, okay?</p> <p>16 A Yes.</p> <p>17 Q Okay. And along with that, down the</p> <p>18 road, this isn't going to be very long, but down</p> <p>19 the road, if at some point you remember something</p> <p>20 from earlier, feel free to interrupt me and say,</p> <p>21 oh, yeah, I happen to remember his name or whatever</p>
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<p style="text-align: right;">Page 6</p> <p>1 happened, okay?</p> <p>2 A Yes.</p> <p>3 Q At any point if you need a break, we can</p> <p>4 take a break. If you want a break, that's fine,</p> <p>5 restroom, drink water, anything like that. Do you</p> <p>6 want water, by the way?</p> <p>7 A No, thank you.</p> <p>8 Q And so this is what's called part of the</p> <p>9 discovery process, so there are certain things that</p> <p>10 in trial might not necessarily be admissible, but</p> <p>11 because this is what's called discovery, we are</p> <p>12 trying to get information, learn additional</p> <p>13 information. There might be points at which</p> <p>14 there's an objection, but you still have to answer</p> <p>15 the question. So for example if there's something</p> <p>16 in trial where I say tell me something that</p> <p>17 somebody else said, that might be hearsay and</p> <p>18 Ms. Francis-Williams might have an objection that</p> <p>19 she puts on the record, but you would still have to</p> <p>20 answer the question, okay?</p> <p>21 A Yes.</p>	<p style="text-align: right;">Page 8</p> <p>1 Basically used to just help me with high kids, my</p> <p>2 two kids.</p> <p>3 Q How old are your children?</p> <p>4 A My oldest two kids, they are 18 and 16.</p> <p>5 He was like a father figure to them. Their father</p> <p>6 been dead for 16 years, 17 this year.</p> <p>7 Q Sorry to hear that. Where did</p> <p>8 Mr. Woodson go to school?</p> <p>9 A I don't remember.</p> <p>10 Q Where did you go to school?</p> <p>11 A I don't remember what school he went to.</p> <p>12 I think he got a GED if I'm not mistaken.</p> <p>13 Q How old was he when you two started</p> <p>14 dating?</p> <p>15 A Probably around 34, 33, something like</p> <p>16 that.</p> <p>17 Q Okay. And I guess in the course of your</p> <p>18 relationship, with her being at some point almost</p> <p>19 your soon to be mother-in-law, what was your</p> <p>20 relationship with her? How often did you see</p> <p>21 Ms. McDougald?</p>
<p style="text-align: right;">Page 7</p> <p>1 Q I want to go back-- are you okay?</p> <p>2 A I just hate re-living this. I'm ready.</p> <p>3 Q A long with that, I understand that, I</p> <p>4 really do appreciate your coming in and talking to</p> <p>5 me today. I want to get all of the information I</p> <p>6 can to figure out where we are with it.</p> <p>7 Let's -- one second. What's your</p> <p>8 relationship with Ms. Verdesa McDougald?</p> <p>9 A I was engaged to her son, Tyree Woodson.</p> <p>10 Q Approximately when did you first meet</p> <p>11 with Mr. Woodson?</p> <p>12 A I had been with Mr. Woodson for six</p> <p>13 years before he got killed, six and a half years.</p> <p>14 Q Do you have any children together?</p> <p>15 A No.</p> <p>16 Q Did he have any other children?</p> <p>17 A No.</p> <p>18 Q Okay. What did Mr. Woodson do for a</p> <p>19 living?</p> <p>20 A He was going to school. He was, he</p> <p>21 basically, he just do errands or something.</p>	<p style="text-align: right;">Page 9</p> <p>1 A Every day. We had a really good</p> <p>2 relationship.</p> <p>3 Q Do you two still have a good</p> <p>4 relationship?</p> <p>5 A Not really.</p> <p>6 Q Why is that?</p> <p>7 A Just a lot of stuff took place when I</p> <p>8 lost Tyree or whatever. Just had a falling out, a</p> <p>9 misunderstanding and she basically took things that</p> <p>10 was from my fiance that I never recovered back, so</p> <p>11 that's it. I never recovered that.</p> <p>12 Q So I want to like take you up to around</p> <p>13 the period when Mr. Woodson died. Obviously at</p> <p>14 some point before that there was an incident in</p> <p>15 which he was shot; is that correct?</p> <p>16 A Yeah, we both were shot.</p> <p>17 Q That was my understanding of it. Can</p> <p>18 you walk me through what happened with that?</p> <p>19 A We went to Franklin to the McDonald's to</p> <p>20 go get some food for us and the kids and we pulled</p> <p>21 up at my apartment on Highland and Franklinton</p>

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<p style="text-align: right;">Page 10</p> <p>1 Road. So we, he parked the car, I lived in a 2 apartment, we to walk through the split. It was 3 like a club on the right-hand side, Pearl's Place 4 was opened up, like music and everything. We get 5 out the car. I'm carrying the sodas, he carrying 6 the food. Once he parked the car, we walked 7 through the split, I was this close to my apartment 8 complex when I heard gun shots. 9 Q What do you mean by this close? 10 A Like from my apartment, actually going 11 into my apartment complex before we were shot, 12 before I heard gunshots. My back is facing the 13 street. Once we walked through the split, I heard 14 gunshots. Like I didn't even know I was shot. I 15 got shot three times. I had seen Tyree had blood 16 on his foot or whatever. He had picked me up and 17 put me in the apartment complex and called for my 18 son, and my son, he called 911. All I remember is 19 that I passed out three times before the ambulance 20 came and the third time that I passed out, I was in 21 Tyree arms, like just bleeding everywhere. Like it</p>	<p style="text-align: right;">Page 12</p> <p>1 who shot you? 2 A No. I remember being at the hospital and 3 two officers came to the hospital. Actually I was 4 asleep at first, but I heard like a whole 5 conversation going on in the hospital. I just 6 remember opening my eyes up and Tyree was just 7 standing right there crying. And the officers was 8 telling him that you need to let your fiance know 9 that we know who shot y'all, it was supposed to 10 have been your cousin and they know basically-- 11 they was telling him that they know who shot us and 12 if we wanted to be protected, to go under 13 protective custody, that Tyree had to testify that 14 it was the guy they were saying that shot us. But 15 we never seen the guy, so there was no point to go 16 to court to testify to say this is the guy that 17 shot us. 18 Q Did you-- 19 A They came to the hospital more than one 20 time since I had been there. 21 Q Who were those officers?</p>
<p style="text-align: right;">Page 11</p> <p>1 was neighbors and stuff coming outside. My kids 2 were coming out. Actually he was on his way to put 3 me in his car before the ambulance pulled up to get 4 ready to take me to the hospital. All I remember 5 is that I just woke up in the hospital hours later, 6 like under all of these lights. He was on his way 7 there. Well, he got there, he was in a wheelchair 8 and he had got shot in his foot. Basically I was 9 in the hospital for a while until I got discharged 10 and I started staying at Ms. Verdesa house. 11 Q Where were you shot? 12 A I was shot in my back three times. 13 Q What was the recovery process for you? 14 A Well, when I was in the hospital, I had 15 a morphine tube that was sewed in my side. I was 16 under medication. I couldn't leave the hospital 17 bed until I got discharged from the hospital. 18 Q And were you actually able to see the 19 person who shot at you? 20 A I got shot in my back. 21 Q Did you ever talk to Mr. Woodson about</p>	<p style="text-align: right;">Page 13</p> <p>1 A I don't know their names offhand. It 2 had been six years. 3 Q Do you remember anything about what they 4 looked like? 5 A I just know that they worked at 6 Southwest District. Prior, before me meeting Mr. 7 Woodson, he used to always get harassed by three 8 officers from Southwest District. Like pulled 9 over, get his money took, they would lock him up. 10 And then when I was at the hospital, I remember 11 being at the hospital and being harassed. Since I 12 have been in the hospital, like I was the one who 13 pulled the trigger on someone, not being treated 14 like the victim. 15 Q Do you know the names of the officers? 16 A I don't know their names. I just know I 17 seen them plenty of times. I lived on Highland 18 Street, across from where Tyree used to be at. So 19 I just know that a couple of times, since I have 20 been dating with him and prior before that, I got a 21 whiff of what they were doing. His mother was</p>

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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 letting me know that they had been harassing him 2 prior before me even dating him. 3 Q And the cousin you are referring to, is 4 that Mr. McDougald? 5 A Yes. 6 Q Have you had any interactions with him 7 at all? 8 A I mean I met him before, I have been 9 around him. He was dating a girl that lived in an 10 apartment across from my house. I used to help 11 feed their kids basically before, around the time 12 before when I started talking to Tyree Woodson. 13 Q Once you started talking to Tyree, what 14 was his relationship with his cousin, 15 Mr. McDougald, like? 16 A I mean family is family. I mean when 17 there used to be holidays and stuff like that, we 18 all be around each other. And like he used to help 19 feed him and like give him clothes and stuff like 20 that. At first they had a good relationship. And 21 then, I don't know, once Tyree got locked up, when</p>	<p style="text-align: right;">Page 16</p> <p>1 a lawyer. Well, he had the lawyer and I basically 2 met-- his mother was just like meeting up with the 3 lawyer and like had the lawyer for real. And then 4 he took it to trial. And then I remember them 5 postponing the trial a couple times before he even 6 got into court for trial, and I would say the trial 7 probably went on for a couple of days and then he 8 was found not guilty. When he was found not 9 guilty, his mother was like doing like a little 10 dance and was like praying and stuff when there was 11 like all of these officers sitting like outside of 12 the courtroom. I remember one officer, when he 13 was-- when we was coming out, one officer was like 14 they going to get him one way or another. 15 Q What is that officers name? 16 A I don't know the officers by name. I 17 never had an account with the officers for me to 18 even know their names. 19 Q How long was he held from the arrest to 20 his actually, when he got off for the not guilty? 21 A How long was he locked up before he got</p>
<p style="text-align: right;">Page 15</p> <p>1 he came home, I don't know, he was like he just 2 trying to get himself together. He not really 3 trying to hang around people and stuff like that. 4 So he was basically staying home with me and my 5 kids, and like we would go and see his mother and 6 do little stuff like take the kids out and do stuff 7 like that. 8 Q When approximately did Mr. Woodson get 9 locked up? 10 A I don't remember the date or the year. 11 Which incident are you talking about, the incident 12 where he was killed, or the incident before? 13 Q Before that. 14 A I sent him to the market. It was around 15 Christmas time. I sent him to the market to get 16 some seasoning. All I know is that people were 17 calling my phone saying that Tyree was in a high 18 speed chase with the police. Like the police were 19 chasing behind his car down Westside Shopping 20 Center, like crashing into the car. And I had got 21 a phone call that he was arrested and I had got him</p>	<p style="text-align: right;">Page 17</p> <p>1 out? 2 Q Yes. 3 A I would say probably like almost a year. 4 Q Where was he held during that time? 5 A He was-- what jail was he in? 6 Q Was it Jessup pretrial? 7 A Huh-uh. He was -- I don't remember, but 8 it wasn't Jessup or nothing like that. He wasn't 9 shipped out. 10 Q It was in the city? 11 A Uh-huh. 12 Q Was it the Baltimore Detention Center or 13 do you remember? 14 A I don't remember what jail it was, but I 15 used to go visit him. But, like I said, that was 16 six years. I know when he was incarcerated, we had 17 got a phone call after he been locked up for a 18 couple of months, that he had got assaulted over 19 the jail where a CO had, where he was jumped by 20 nine or 10 guys. They beat him up and stuff. 21 Q Do you know anything about who that CO</p>

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18 to 21

<p style="text-align: right;">Page 18</p> <p>1 was?</p> <p>2 A No.</p> <p>3 Q Do you know anything about who the</p> <p>4 people in the jail were?</p> <p>5 A No.</p> <p>6 Q While Mr. Woodson was in jail, did he</p> <p>7 pick up any affiliation with the Black Gorilla</p> <p>8 Family?</p> <p>9 A No, not that I'm aware of.</p> <p>10 Q Once he got out of jail, did he pick up</p> <p>11 any affiliation with the Black Gorilla Family?</p> <p>12 A No. I wasn't aware of it if he did.</p> <p>13 Q Were you ever aware of any affiliation</p> <p>14 with Mr. McDougald, Mr. Woodson's cousin, with the</p> <p>15 Black Gorilla Family?</p> <p>16 MS. FRANCIS-WILLIAMS: Objection.</p> <p>17 A I don't know about nothing like that. I</p> <p>18 don't know what his relationship is with the Black</p> <p>19 Gorilla Family.</p> <p>20 Q Prior to Mr. Woodson's death, like on</p> <p>21 that day, when were you first made aware that he</p>	<p style="text-align: right;">Page 20</p> <p>1 get dressed and I came downstairs and I sat on the</p> <p>2 couch. When I sat on the couch, I was just asking</p> <p>3 her like where Tyree was at and she basically was</p> <p>4 saying-- she was in the kitchen making coffee. And</p> <p>5 Tyree had left his reading glasses in the house, so</p> <p>6 she basically was walking to the door to go tell</p> <p>7 them she was leaving his glasses, and when she went</p> <p>8 to the door, it was like all of these officers out</p> <p>9 there and they was checking him and they had</p> <p>10 knocked his little walker thing down that he was</p> <p>11 walking with on the ground. And she said they was</p> <p>12 checking him and they put him in an armored car.</p> <p>13 So by the time I got downstairs, he was already</p> <p>14 gone. I never seen him after that.</p> <p>15 Q Let me step back for a moment. You said</p> <p>16 he had like a walker thing?</p> <p>17 A Yeah. So he had got shot in his foot.</p> <p>18 He had like a little blue shoe on that got the toes</p> <p>19 that come out, that snap over. So he had like a</p> <p>20 little walker thing that he was walking with. At</p> <p>21 first he was on crutches when he first got</p>
<p style="text-align: right;">Page 19</p> <p>1 had been picked up by the police?</p> <p>2 A Well, actually, I was in the house</p> <p>3 asleep. Ms. McDougald had came upstairs and woke</p> <p>4 me up and she told me I had to get dressed because</p> <p>5 it was police's, it was officers downstairs and</p> <p>6 they was coming to search our home. They had a</p> <p>7 warrant. By the time she helped me get dressed</p> <p>8 because I was-- by the time she helped me get</p> <p>9 dressed and I came downstairs-- well, can I go</p> <p>10 back real quick?</p> <p>11 Q Sure.</p> <p>12 A So that morning before he left out, I</p> <p>13 was asleep in the bed and he actually woke me up,</p> <p>14 gave me a kiss on my forehead and was basically</p> <p>15 telling me that he had an appointment, that he</p> <p>16 would see me later when he come back. So I would</p> <p>17 say probably like 20 minutes after that, his mother</p> <p>18 had came and woke me up and was like basically</p> <p>19 telling me I had to get dressed because it was like</p> <p>20 all of these officers downstairs, they had a search</p> <p>21 warrant to search our premises. So she helped me</p>	<p style="text-align: right;">Page 21</p> <p>1 discharged, and then I guess when he went for his</p> <p>2 little outpatient appointment, they had gave him</p> <p>3 the little walker thing.</p> <p>4 Q And did he have the same, it's like a--</p> <p>5 you said it's like a, not a cast fully, but like--</p> <p>6 A No, he had a shoe on, the blue shoe that</p> <p>7 they put on your feet that have the two snaps on</p> <p>8 there with the toes that hang out. That's the shoe</p> <p>9 that he had on when he got discharged from the</p> <p>10 hospital and that's the shoe that he continued to</p> <p>11 wear. So I seen the shoe that they put on the</p> <p>12 news. That is not the shoe that he was wearing.</p> <p>13 Q Okay. That's different than the one</p> <p>14 that you recall?</p> <p>15 A Yes.</p> <p>16 Q Does it go over his actual shoe--</p> <p>17 A No.</p> <p>18 Q -- or just--</p> <p>19 A Basically he had his foot inside of the</p> <p>20 shoe. You could see his socks and his toes hanging</p> <p>21 through the top part, and the other foot had a</p>

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 regular shoe on. So it was like one of those blue 2 little slippers, one of them blue shoes that you 3 snap over when you hurt your foot that they give 4 you at the hospital. 5 Q What was Mr. Woodson's mood I guess from 6 the period that he and you were shot, to the, I 7 guess his last day, the day that he was taken away 8 that day? 9 A Well, basically since I was in the 10 hospital-- and it's like at first when I got to the 11 hospital, when I was there, he was laying there, it 12 was like he just was like just upset more than 13 anything that that happened, that we got shot and 14 stuff. And then it didn't make it no better with 15 the police coming there every single day while he 16 was there. It was to the point where as though 17 they took my property. They took my property when 18 I had got shot, a couple of days after I got shot 19 from the University Shock Trauma. I was asking 20 them to get my property when I was getting 21 discharged from the hospital, and they told me that</p>	<p style="text-align: right;">Page 24</p> <p>1 somebody. 2 Q Did Mr. Woodson ever talk about who he 3 thought might have shot you two? 4 A Never. 5 Q Did you ever talk about who you thought 6 might have shot you two? 7 A No. I didn't think that it would be 8 like somebody that we knew that would shoot us. 9 Around that area where we live at, there's a lot of 10 shooting and stuff goes on around there. So I 11 didn't know nothing about nothing until the 12 officers came to the hospital and told me that it 13 was him who shot me. 14 Q Did Mr. Woodson ever talk to 15 Mr.McDougald about it afterwards? 16 A Never. He was at the hospital with me 17 every day. When he wasn't there, he might leave 18 for a couple minutes to take my kids and go get 19 food or go do something like that. Go pick them up 20 to bring them to the hospital to come see me and 21 drop them back off to where they were staying at.</p>
<p style="text-align: right;">Page 23</p> <p>1 the officers had left, that they took my property 2 to Southwest District so that me and Tyree Woodson 3 can have a reason to have to come down there, 4 because they wanted to talk to him for questioning. 5 Q What property did they take? 6 A They took my engagement ring, my wedding 7 ring, my earrings, my necklace. I can't recall 8 what else they took. 9 Q So that the bag of property that you had 10 when you were admitted? 11 A Yeah. They took my clothes and all of 12 that type of stuff. 13 Q So you said he was sort of upset about 14 being shot? 15 A I wouldn't say he was upset. He was 16 just mad that we got shot basically and then just 17 basically couldn't believe that it happened. I 18 wouldn't say upset, was in disbelief that we got 19 shot. And then it just didn't make the situation 20 no better with the police coming to the hospital 21 every single day, harassing us like we shot</p>	<p style="text-align: right;">Page 25</p> <p>1 Other than that, he stayed at the hospital with me. 2 Q Do you know if he ever talked to anyone 3 else, you know, about Mr. McDougald? 4 A No, never. 5 Q So going back to the day he passed away, 6 you said he left that morning and then the next 7 thing you know, Ms. McDougald is sort of waking you 8 up and saying, hey, the police are here, they're 9 searching the house? 10 A She was like TT, because they call me 11 TT, she was like TT, come here baby, get up, we got 12 to get up and come down stairs, you got to get 13 dressed. So I am like what's going on, where Tyree 14 at? And she like it's a whole bunch of officers 15 downstairs with a search warrant, you have to get 16 dressed and come downstairs, you can't be up here 17 while they searching. 18 So basically she helped me put me stuff 19 on and I came downstairs and sat on the couch while 20 they came upstairs and did there search. 21 Q Did Ms. McDougald tell you anything</p>

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26 to 29

<p style="text-align: right;">Page 26</p> <p>1 about what the police said when they picked up Mr. 2 Woodson? 3 A All I know was that she was like they 4 had a search warrant, but then when me and her were 5 talking or whatever, she was like, when she read 6 the search warrant, it was basically saying that 7 they had a search warrant to come search her house 8 because he was supposed to have shot somebody. 9 Q In terms of when Mr. Woodson left that 10 morning and the police were there, did she tell you 11 what, if anything, they said to him? 12 A Basically she just said-- well, I told 13 you she was in the kitchen making coffee, and he 14 left his glasses in the kitchen, because I guess 15 they was in the kitchen talking like they do every 16 morning. This is like a normal thing with them. 17 So like they drink coffee and we might have a 18 little conversation and eat breakfast, but they 19 drink coffee and do that, mother-son or whatever, 20 or I might be down there. But she said she was 21 making him some coffee and he forgot the glasses,</p>	<p style="text-align: right;">Page 28</p> <p>1 upstairs. They was in there for a minute, they was 2 upstairs, and then they came downstairs and she was 3 asking them-- they was like they found some stuff, 4 and she was asking them what did they find. They 5 wouldn't show her what they found. And then the 6 next thing I know, they cleared up-- when they 7 went upstairs, they came downstairs, they never 8 identified what they had found upstairs or nothing. 9 All I know is they was like doing a whole bunch of 10 whispering. The ones who was upstairs searching 11 was like pulling the other ones out on the porch, 12 and they basically were saying they found some 13 evidence and stuff in there, but they would not 14 disclose to us what they had found. They never 15 showed-- they never said nothing to us about what 16 they found. 17 Q And they left after that point? 18 A Uh-huh, yes. 19 Q At some point during this day-- so this 20 was basically the morning he leaves, pretty much 21 early morning when the police are in there doing</p>
<p style="text-align: right;">Page 27</p> <p>1 so she was going to the front to go tell him that 2 he left his glasses in there. Basically the 3 officers was checking him at the car. It wasn't a 4 police car, it was an unmarked car. But when I had 5 like glanced out the door or whatever, when I came 6 downstairs like, I seen the officer was standing 7 right there with like khaki pants on. By the time 8 I got downstairs, he was already gone. So I don't 9 see what happened. 10 Q Describe sort of what was happening 11 during the search of your house. 12 A It's not my house. 13 Q Is it Ms. McDougald's house? 14 A Basically, uh-huh. I was basically 15 sitting on the couch. Basically they came in, they 16 were saying more stuff or whatever to her. And I 17 think she got into a fuss with one of them or 18 something. Basically it was like basically tearing 19 her whole upstairs up. Basically were saying 20 something about they looking for a gun, this and 21 that, and that's it. All I know is they were</p>	<p style="text-align: right;">Page 29</p> <p>1 the search, at some point does Mr. Woodson contact 2 you? 3 A So I was downstairs basically crying, 4 just trying to think out what was going on. I am 5 just sitting right here, I have just been shot, 6 I'm under medication. He is taking me to my 7 appointments. He is helping me take care of my 8 kids. At this point it's just everything rushing 9 through my head. So when the phone had rung, 10 Ms. McDougald had answered the phone and I was 11 downstairs on the couch. She basically was like 12 TT, Tyree wants you. And I am like-- she comes 13 down, meets me at the steps or whatever, I get the 14 phone. So I'm talking to him on the phone. When I 15 looked at the phone, it was like, it was my cell 16 phone number. I had the cell phone that was in my 17 name. We both had cell phones. So it popped up 18 with my name on the caller ID. So I am like this 19 is weird, he locked up, why is he calling on his 20 cell phone? So the whole time that I'm on the 21 phone talking to him, it's like, he was like hello,</p>

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30 to 33

<p style="text-align: right;">Page 30</p> <p>1 I was like hello, what's going on? I am crying, 2 trying to figure out why they locked him up, what's 3 going on. They had him down there for questioning, 4 they trying to say that he shot somebody. Then I 5 hear a whole bunch of noise in the background, like 6 people was talking. And then he was like-- there 7 was just like a whole bunch of yelling and stuff. 8 I heard probably about two or three other voices 9 besides Tyree voice that was in the room with him. 10 And I keep hearing him. Just basically it's a 11 conversation going on on the other side of the 12 phone, and I am on the phone listening, it's him 13 talking. He is talking back to the police's, 14 telling them that they wrong, he didn't do nothing, 15 here we go again, this type of stuff. And then I 16 just keep hearing yelling and I am asking him what 17 am I supposed to do, what's going on? So he was 18 like I'm going to call you when I get to Central 19 Booking's. And then it's still like conversation 20 being talked to in the background. And then the 21 next thing I know, Tyree's voice is just like--</p>	<p style="text-align: right;">Page 32</p> <p>1 A It's like-- I'm sorry. 2 Q Go ahead. 3 A It's like at first when he was talking 4 on the phone, it was just like a regular 5 conversation, like any other time when he get 6 locked up. At first I didn't like really hear-- 7 like I heard people talking in the background, but 8 wasn't like screaming and shouting at first until 9 we started getting into the middle of the 10 conversation. His voice was like I am going to 11 call you when I get to Central Booking's, like a 12 regular routine thing for when he is locked up. 13 So it didn't dawn on me to think nothing was 14 happening until he started crying and stuff and I 15 was crying, and then he was like I just want to let 16 you know if something happens to me, I want you to 17 know that I love y'all. And then I heard yelling 18 again in the background and then the phone hung up. 19 I didn't speak with him no more since then. 20 Q So he told you he was going to call you 21 once he got to Central Booking?</p>
<p style="text-align: right;">Page 31</p> <p>1 when I started crying and stuff, when I was talking 2 to him, it was like he was crying, and basically he 3 just was like here we go again. They trying to say 4 that he shot somebody, he was crying, I was crying, 5 and then the next I know, I hear the officers or 6 whatever yelling in the background. Then he was 7 telling me like if something happens to me, I just 8 want to let you know that I love y'all. And then I 9 heard screaming again and then the phone hung up. 10 Q So when you are talking to him, you're 11 under the emotion of having recently been shot, the 12 craziness of the house being searched, you are-- 13 A Just not knowing what was going on, 14 period. 15 Q And so you are emotional and when you 16 talk to him, he starts to get emotional along with 17 you, sort of sympathy for you; is that right? 18 MS. FRANCIS-WILLIAMS: Objection. 19 Q You can answer. 20 A Could you repeat that again? 21 Q So you are emotional--</p>	<p style="text-align: right;">Page 33</p> <p>1 A Uh-huh, yes. 2 Q You talked about the one case that he 3 had where he was locked up for a period of time. 4 Did he have any other cases that he dealt with 5 while you two were together? 6 A Not that I know of. 7 Q And you said he said something like 8 basically here we go again? 9 A Yes. It's history with Southwest 10 District officers and Tyree. Not just Tyree, but 11 other people that he hung with also. 12 Q The way you took it was he was going to 13 have to go through this process again? 14 A Yes, sir, like a regular routine thing. 15 It didn't dawn on me to think that, oh, that would 16 be the last time I would talk to him. So after we 17 got off the phone and stuff like that, the family 18 and stuff was calling on the phone, they said they 19 seen something on the news that somebody was 20 supposed to had got shot in the police station or 21 something like that. His mother was in the</p>

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34 to 37

<p style="text-align: right;">Page 34</p> <p>1 bathroom when I answered the phone. So I get to 2 calling her in the room. They was asking me like 3 please tell me that's not Tyree. It's a guy with 4 Tyree same age that supposed to had got shot at the 5 police station. Keep in mind, I wasn't watching 6 the news. So it was all new to me. And then his 7 mother had came there, she cut the news on. Nobody 8 never came to his mother house to let us know that 9 that was Tyree. His mother went to the police 10 station and that's how they found out that it was 11 supposed to be him. 12 Q At any point prior to the date of his 13 death, did Mr. Woodson express anything about fear 14 for his safety? I mean obviously you two were 15 shot. 16 A If there's something like that going on, 17 he is the man, he not going to tell me if he afraid 18 of his safety or something like that. He just 19 wasn't acting like himself, like paranoid, like 20 thinking stuff was going-- just not himself, just 21 like looking over his shoulder every time we come</p>	<p style="text-align: right;">Page 36</p> <p>1 to him in that phone call, there wasn't a feeling 2 that you had, even knowing him for that time, that 3 he was going to hurt himself? 4 A Never. It never clicked in my mind. 5 Q Was there anything about hearing his 6 voice or the way he was saying, not specifically 7 what he said, but the way he was saying what he 8 said, that made you, knowing him for six years, 9 believe that he was going to hurt himself? 10 A Never, not once. Tyree, the type of 11 person that he was, he was a family oriented type 12 person. Like he was a stand-up type of guy. Like 13 everybody in the community loved him, his family 14 loved him, my family loved him, my friends loved 15 him. It's no way in the world that Tyree could 16 have killed himself in no police station. It's no 17 way in the world. And it's been six years, it took 18 six years for this to have to be coming up and I 19 just feel like he just another black man and people 20 can just get away with doing whatever they want to 21 do and just sweep stuff under the rug. Me and</p>
<p style="text-align: right;">Page 35</p> <p>1 out the door and stuff like that since we got shot. 2 The regular thing that somebody would go through 3 once they have been shot. Nothing out of the 4 ordinary. 5 Q Do you know if he carried a firearm? 6 A Never had a gun. Tyree lived with me. 7 His property and stuff was at my house. I would 8 know if he had a gun. 9 Q While you were on the phone with him, 10 did he say anything about hurting himself? 11 A Never. I want to just go on record by 12 saying that I have been with Tyree for six and a 13 half years. He don't have no type of mental 14 problems. There's no way in this world that he 15 would even think that, he would commit suicide or 16 do anything like that. When I was in the hospital, 17 he had the keys to my apartment. He was alone by 18 himself and my kids was not there. If he wanted to 19 commit suicide, why would he go to a police station 20 to do it? 21 Q And knowing him for six years, talking</p>	<p style="text-align: right;">Page 37</p> <p>1 Tyree were engaged to get married that same year 2 he got killed. There is no way in the world he 3 would have committed suicide. 4 Q Before his death, was there anything in 5 terms of any gang, not only the Black Gorilla 6 Family, any gang affiliation that he ever mentioned 7 to you? 8 A No. 9 Q Any concern with any gang affiliation? 10 A No. 11 Q Prior to you and Mr. Woodson being shot, 12 did he ever express a concern that somebody would 13 hurt him? 14 A No. 15 Q Obviously you've lived through it. Is 16 there anything you reviewed before today to help 17 you with-- 18 A I didn't have to. This is something 19 that traumatized me for over six years. My fiance 20 was ripped from me and taken from me and my kids. 21 There is no way in the world I have to go over it.</p>

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38 to 41

<p style="text-align: right;">Page 38</p> <p>1 That stuck with me for six years.</p> <p>2 Q When you were on the phone with</p> <p>3 Mr. Woodson, did it sound like it was a speaker</p> <p>4 phone, or could you tell?</p> <p>5 A He sounded like he was on a regular</p> <p>6 phone. It was our phone. You could tell the</p> <p>7 difference, whether you are on a speaker or you are</p> <p>8 just on a regular conversation.</p> <p>9 Q So it didn't sound like you were on a</p> <p>10 speaker phone?</p> <p>11 A Huh-uh, no. I just thought it was weird</p> <p>12 because like all the time, any other time that</p> <p>13 Tyree get locked up, it's like I get a phone call</p> <p>14 from him from the jail. I never got a chance to</p> <p>15 talk to Tyree ever, not one time when he been</p> <p>16 locked up-- when he first get locked up, I never,</p> <p>17 ever talked to him on a cell phone. Not ever. I</p> <p>18 just thought it was kind of weird that when I</p> <p>19 looked at the caller ID, he called from the cell</p> <p>20 phone, and he is in custody, and he is calling from</p> <p>21 his cell phone. It just didn't make sense to me.</p>	<p style="text-align: right;">Page 40</p> <p>1 to court for somebody else's court that was</p> <p>2 around-- when the boy got shot by our way, Tyree</p> <p>3 was actually coming out the carryout store and he</p> <p>4 knew the guy. So he was like standing right there</p> <p>5 with the guy until like the ambulance and stuff</p> <p>6 came. So he had the guy blood and stuff all over</p> <p>7 him. It was somebody that he hung out with. And</p> <p>8 they were basically trying to come, they was coming</p> <p>9 to get him for court while he was locked up. They</p> <p>10 tried to take him to court for somebody else, that</p> <p>11 had to do with that shooting, that he had nothing</p> <p>12 to do with.</p> <p>13 Q Do you know if he testified in that</p> <p>14 case?</p> <p>15 A I couldn't tell you, I don't know.</p> <p>16 Q Did he ever express being worried about</p> <p>17 testifying in that case?</p> <p>18 A No, he never told me nothing about</p> <p>19 testifying in it. I know a couple of times, like</p> <p>20 way before we even got shot, like the summertime we</p> <p>21 would be outside, just standing outside, or we</p>
<p style="text-align: right;">Page 39</p> <p>1 Q About how many times had he been locked</p> <p>2 up before, if you recall?</p> <p>3 A Well, since I have been with him, I</p> <p>4 would say probably two or three times.</p> <p>5 Q And either of those cases were dropped</p> <p>6 or he beat all of those cases?</p> <p>7 A Uh-huh, yes.</p> <p>8 Q Other than what you described of just</p> <p>9 like his relationship with some of the officers at</p> <p>10 Southwest District, was there any specific concern</p> <p>11 he had, that he expressed to you about being</p> <p>12 charged with anything?</p> <p>13 A Can you explain that again?</p> <p>14 Q You said generally he was being harassed</p> <p>15 by officers at the Southwest District. Other than</p> <p>16 that, did he ever express like, hey, I'm afraid I'm</p> <p>17 going to be charged with this crime or that crime</p> <p>18 or whatever else?</p> <p>19 A I know when he was locked up, before he</p> <p>20 had came home, before all of this stuff had</p> <p>21 happened, he was saying that they was dragging him</p>	<p style="text-align: right;">Page 41</p> <p>1 might be in a car riding somewhere, the police</p> <p>2 would just pull him over. One time, well, we</p> <p>3 pulled you over because the taillight was knocked</p> <p>4 out, and then the whole time there was nothing</p> <p>5 wrong with his taillight. And they would like take</p> <p>6 money from him and stuff like that and don't lock</p> <p>7 him up. I done witnessed that a couple of times.</p> <p>8 Q What did Mr. Woodson do for a living?</p> <p>9 A What you mean, what did he do for a</p> <p>10 living? He went to school. Other than that, he</p> <p>11 didn't work.</p> <p>12 Q So did you basically support the</p> <p>13 household or how did that go?</p> <p>14 A I worked for Peter Angelos's law firm</p> <p>15 for six and a half years, so yeah.</p> <p>16 Q You said there was a breakdown between</p> <p>17 you and Ms. McDougald, and sometimes that's just</p> <p>18 how family's go, you know, after a death, just</p> <p>19 splitting up assets and all of that. What's your</p> <p>20 relationship, other than I guess Ms. McDougald,</p> <p>21 with the rest of Mr. Woodson's family?</p>

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<p style="text-align: right;">Page 42</p> <p>1 A Well, I talk to his brother every single 2 day. He still acknowledge me as his sister-in-law. 3 I talk to his other family members, just not his 4 mother. 5 Q You said there were some issues with the 6 property. What property was there after his death 7 that I guess-- what was that issue? 8 A Well, basically we had a savings that 9 was at his grandmother house at the safe. His 10 grandmother cleared the whole safe out. She took 11 his wedding ring that I paid for. She kept a lot 12 of things that were sentimental that I was not able 13 to recover. Basically I was treated like I was 14 just a girlfriend, so. 15 Q Is there anything that I haven't asked 16 that you think might be helpful towards-- you know, 17 anything that I haven't mentioned that you think 18 might be helpful towards me understanding exactly 19 what happened that day? 20 A No, because I'm still trying to piece it 21 together to figure out what happened that day. I</p>	<p style="text-align: right;">Page 44</p> <p>1 hallway, it was like three officers that were 2 seated outside of the courtroom, and basically they 3 face was just like disgust that he beat the case. 4 So she was doing a prayer saying thank you and I 5 was like not guilty, and the officer made a 6 comment. It was like oh, we are going to get him 7 one way or another. And they walked out the 8 courthouse. 9 Q Do you know if Mr. Woodson took that as 10 a threat that somebody would get him or hurt him? 11 A Yes. 12 Q Now, you described knowing him a good 13 while before his passing? 14 A Yes. 15 Q Could you describe if there was a 16 distinction between his tone when you first got on 17 the phone the day that he passed, to when the 18 conversation closed? Was there any change in his 19 tone? 20 A Yeah. Like I said, towards the middle 21 of the call, he was like crying and like, just like</p>
<p style="text-align: right;">Page 43</p> <p>1 just know that whatever happened, it was foul 2 play. There is no way in the world possibly that 3 he would have killed himself, and I know that for a 4 fact. 5 MR. BALL: I don't have anything 6 further. Ms. Francis-Williams might have follow-up 7 questions. I'm not sure. 8 MS. FRANCIS-WILLIAMS: Just very 9 briefly. 10 EXAMINATION BY MS. FRANCIS-WILLIAMS: 11 Q You testified on direct-- well, the 12 question was did Tyree ever express a concern that 13 someone would hurt him. Then you also described an 14 incident after court when an officer made a 15 statement that we are going to get you or something 16 of that fact? 17 A Yes. So his mother was doing like, 18 saying her little prayer because she really into 19 church or whatever. So basically we was keep 20 coming out to this trial every single day, and when 21 they found him not guilty, we was coming out the</p>	<p style="text-align: right;">Page 45</p> <p>1 disturbed. I could tell that it probably was 2 something going on. But one thing about Tyree, 3 like when there is stuff going on like that, he try 4 to keep me from harm's way. Like certain stuff he 5 not even going to discuss with me about. But 6 certain things, like if he feels like it need to be 7 talked about, then we will talk about it. 8 Q Would you describe the phone call ending 9 abruptly or suddenly? 10 A Suddenly, like rushed off. 11 MS. FRANCIS-WILLIAMS: No further 12 questions. 13 MR. BALL: One follow-up from that. 14 EXAMINATION BY MR. BALL: 15 Q When you say that he tries to hold 16 certain stuff, the typical idea of like a man being 17 the man, the sort of rock of a family, is that what 18 he was typically like? 19 A Yes. 20 MR. BALL: That is all I have. 21 MS. FRANCIS-WILLIAMS: No further</p>

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46 to 48

<p style="text-align: right;">Page 46</p> <p>1 questions.</p> <p>2 MR. BALL: You have a right to-- there</p> <p>3 is sort of two ways you can go about it. You can</p> <p>4 actually read the transcript and sign off on it, or</p> <p>5 you can waive the reading of the transcript and</p> <p>6 sign off on it. If you read it, you have an</p> <p>7 opportunity to go through and if there's something</p> <p>8 that is not exactly what you said, you can correct</p> <p>9 it. Otherwise, you can say I think that he has</p> <p>10 been taking everything down correctly and you can</p> <p>11 waive that. That's your choice.</p> <p>12 THE WITNESS: I would like to read it.</p> <p>13 (Deposition concluded at 10:40 a.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p style="text-align: right;">Page 48</p> <p>1 STATE OF MARYLAND, COUNTY OF CARROLL:</p> <p>2 I, Richard D. Baker, Jr., a Notary Public in</p> <p>3 and for the State of Maryland, County of Carroll,</p> <p>4 do hereby certify the within named Tahesha Juanita</p> <p>5 White personally appeared before me at the time and</p> <p>6 place herein set out and, after having been duly</p> <p>7 sworn by me according to law, was interrogated by</p> <p>8 counsel.</p> <p>9 I further certify that the examination was</p> <p>10 recorded stenographically by me and then</p> <p>11 transcribed from my stenographic notes to the</p> <p>12 within typewritten matter in a true and accurate</p> <p>13 manner. I further certify that the stipulations</p> <p>14 contained herein were entered into by counsel in my</p> <p>15 presence. I further certify that I am not of</p> <p>16 counsel to any of the parties, nor an employee of</p> <p>17 counsel, nor related to any of the parties, nor in</p> <p>18 any way interested in the outcome of this action.</p> <p>19 AS WITNESS my hand and notarial seal this</p> <p>20 19th day of March, 2020, at Sykesville, Maryland.</p> <p>21</p> <p style="text-align: right;">_____ Richard D. Baker, Jr., Notary Public</p>
<p style="text-align: right;">Page 47</p> <p>1 CERTIFICATE OF DEPONENT</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7 I hereby certify that I have read and</p> <p>8 examined the foregoing transcript, and the same is</p> <p>9 a true and accurate record of the testimony given</p> <p>10 by me.</p> <p>11 Any additions or corrections that I feel</p> <p>12 are necessary, I will attach on a separate piece of</p> <p>13 paper to the original transcript.</p> <p>14</p> <p>15</p> <p style="text-align: center;">_____ Tahesha Juanita White</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	

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<hr/> <p style="text-align: center;">1</p> <hr/> <p>10 17:20 10:40 46:13 16 8:4,6 17 8:6 18 8:4</p>	<p>ahead 32:2 ambulance 10:19 11:3 40:5 Angelos's 41:14 apartment 9:21 10:2,7, 10,11,17 14:10 35:17 appointment 19:15 21:2 appointments 29:7 approximately 7:10 15:8</p>	<p>basically 7:21 8:1 9:9 11:8 14:11 15:4 16:1 19:14,18 20:3,6 21:19 22:9 23:16,17 25:18 26:6, 12 27:2,14,15,18,19 28:12,20 29:3,11 30:10 31:2 33:8 40:8 41:12 42:8, 13 43:19 44:2 basically-- 12:10 bathroom 34:1 beat 17:20 39:6 44:3 bed 11:17 19:13 black 18:7,11,15,18 36:19 37:5 bleeding 10:21 blood 10:15 40:6 blue 20:18 21:6 22:1,2 Booking 32:21 Booking's 30:19 32:11 boy 40:2 break 6:3,4 breakdown 41:16 breakfast 26:18 briefly 43:9 bring 24:20 brother 42:1 bunch 25:14 28:9 30:5,7</p>	<p>care 29:7 carried 35:5 carrying 10:5 carryout 40:3 case 33:2 40:14,17 44:3 cases 33:4 39:5,6 cast 21:5 cell 29:15,16,17,20 38:17, 19,21 Center 15:20 17:12 Central 30:18 32:11,21 chance 38:14 change 44:18 charged 39:12,17 chase 15:18 chasing 15:19 Chaz 4:13 checking 20:9,12 27:3 children 7:14,16 8:3 choice 46:11 Christmas 15:15 church 43:19 city 17:10 cleared 28:6 42:10 clicked 36:4 close 10:7,9 closed 44:18 clothes 14:19 23:11 club 10:3 coffee 20:4 26:13,17,19, 21 comment 44:6 commit 35:15,19 committed 37:3 community 36:13</p>
<hr/> <p style="text-align: center;">2</p> <hr/> <p>20 19:17</p>	<p>are-- 31:12 area 24:9 armored 20:12 arms 10:21 around-- 40:2 arrest 16:19 arrested 15:21 asleep 12:4 19:3,13 assaulted 17:18 assets 41:19 assumption 5:14 attorney 4:14 aware 18:9,12,13,21</p>		
<hr/> <p style="text-align: center;">3</p> <hr/> <p>33 8:15 34 8:15</p>			
<hr/> <p style="text-align: center;">9</p> <hr/> <p>911 10:18</p>			
<hr/> <p style="text-align: center;">A</p> <hr/> <p>a-- 21:4 a.m. 46:13 abruptly 45:9 account 16:17 acknowledge 42:2 acting 34:19 actual 21:16 additional 6:12 address 4:11,12 admissible 6:10 admitted 23:10 affiliation 18:7,11,13 37:6,9 afraid 34:17 39:16 age 34:4</p>	<hr/> <p style="text-align: center;">B</p> <hr/> <p>baby 25:11 back 9:10 10:12 11:12,20 19:10,16 20:15 24:21 25:5 30:13 back-- 7:1 background 30:5,20 31:6 32:7,18 bag 23:9 Baker 4:15 Ball 4:5,13 43:5 45:13,14, 20 46:2 Baltimore 17:12</p>	<hr/> <p style="text-align: center;">C</p> <hr/> <p>call 15:21 17:17 25:10 30:18 32:11,20 36:1 38:13 44:21 45:8 called 4:2,14 6:8,11 10:17,18 38:19 caller 29:18 38:19 calling 15:17 29:19 33:18 34:2 38:20 car 10:1,5,6 11:3 15:19,20 20:12 27:3,4 41:1</p>	

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